

**ORIGINAL**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**KEITH B. BURKINS**

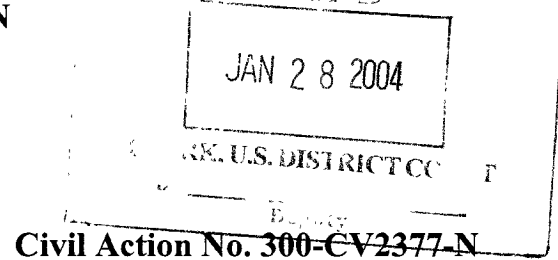
**Plaintiff,**

**v.**

**ROGER A. RUDLOFF,**

**Defendant.**

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**DEFENDANT'S FIRST SUPPLEMENTAL PROPOSED WITNESS LIST,  
EXHIBIT LIST AND DEPOSITION DESIGNATIONS**

**COMES NOW, DEFENDANT, ("ROGER RUDLOFF"), and files this First Supplemental Proposed Witness List, Exhibit List and Deposition Designations:**

**WITNESSES**

1. Keith Burkins. Mr. Burkins will testify regarding his allegations against Officer Rudloff. (2 hours).
2. Officer Roger Rudloff. Officer Rudloff will testify regarding the events of November 17, 1999, and the physical confrontation he experienced with the Plaintiff, Keith Burkins as well as his efforts to subdue Mr. Burkins. (2 hours).
3. Sergeant Jack Misak. Sergeant Misak will testify that he was standing next to Plaintiff Keith Burkins during the time that he was attended by the Dallas Fire Paramedics and that Mr. Burkins never stated he was struck by Officer Rudloff in the head with a flashlight. (1 hour).
4. Ms. Tami Kayea. Ms. Kayea will testify that she was one of the paramedics who

treated Mr. Burkins for injuries sustained on November 17, 1999, and that the injuries sustained by Mr. Burkins were not consistent with having been hit with a flashlight. (1 hour).

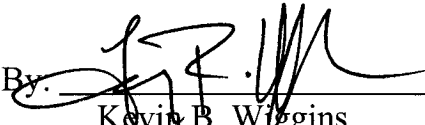
#### **EXHIBITS**

1. Photographs of the scene of the event made the basis of this lawsuit.
2. Excerpts from the Dallas Police Department Internal Affairs Division report.
3. Plaintiff's discovery responses.
4. Dallas Police Department Internal Affairs Procedures.

#### **DEPOSITION EXCERPTS**

1. Deposition of Officer Tracy Smith (for impeachment purposes).
2. Deposition of Keith Burkins (for impeachment purposes).

Respectfully Submitted,

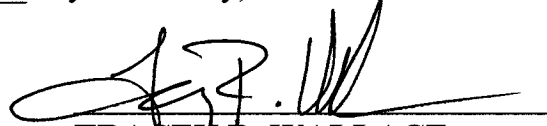
By:   
Kevin B. Wiggins  
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**ATTORNEYS FOR DEFENDANT  
ROGER RUDLOFF**

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing has been forwarded to all parties of record on this the 28<sup>th</sup> day of January, 2004:

  
**TRACEY R. WALLACE**